UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK		
JEMAL EARLE, -against-	Plaintiff,	NOTICE OF MOTION 16-CV-171 (SJ) (RML)
THE CITY OF NEW YORK, ET AL.,		
	Defendants.	
	X	

PLEASE TAKE NOTICE, that upon the annexed declaration of Angharad K. Wilson, Esq., dated July 3, 2019, the exhibits thereto, the memorandum of law submitted herewith, and upon all prior pleadings and proceedings had herein, defendants City of New York, Anthony Rivelli, David Perez, Stephen Crozier, Marc Rudon, Rohan Shaw, and Anthony O'Toole will move this Court, Hon. Sterling Johnson, Jr., at the Courthouse, 225 Cadman Plaza, Brooklyn, New York, on a date and time to be determined by the Court, for an order pursuant to Rule 56(c) granting defendants motion dismissing Complaint, in its entirety, with prejudice, and for such

other and further relief as the Court deems just and proper.

Dated: New York, New York

July 3, 2019

ZACHARY W. CARTER

Corporation Counsel of the City of New York Attorney for Defendants City of New York, Rivelli, Perez, O'Toole, Crozier, Rudon, and Shaw 100 Church Street
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By: /s/
Angharad K. Wilson, Esq.
Senior Counsel

TO: ALL Counsel (BY EMAIL AND HAND)